



CDSS

WILL LIGHTBOURNE
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STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
744 P Street • Sacramento, CA 95814 • www.cdss.ca.gov



EDMUND G. BROWN JR.
GOVERNOR

October 9, 2015

Lori Cox, Director
Alameda County Social Services Agency
2000 San Pablo Ave., 4th Floor, Suite #445
Oakland, CA 94612

Dear Ms. Cox:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided to the reviewer from our office, Ms. Elsa Vazquez during the course of the Civil Rights Compliance Review of September 15-19, 2014. Enclosed is the final report on the review. We apologize for the delay.

There are some compliance issues (deficiencies) identified in the report, which will require the development of a Corrective Action Plan (CAP). Please submit your CAP within 60 days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the enclosed report.

Please submit your CAP in both hardcopy and, in an effort to comply with ADA website accessibility, we also require the CAP to be submitted electronically as a Word document via email at crb@dss.ca.gov.

We will provide a copy of your report to any individual who makes a valid Public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it becomes a public document as well. In addition, these documents are published on our website at <http://www.cdss.ca.gov/civilrights/PG2890.htm>

If you need technical assistance in the development of your CAP, please feel free to contact Ms. Elsa Vazquez at (916) 654-2110. You may also contact us by e-mail at crb@dss.ca.gov.

Sincerely,

Original signed by Bureau Chief

JIM TASHIMA, Chief
Civil Rights Bureau
Human Rights and Community Services Division

Enclosure

c: Darleen Brooks, Civil Rights Coordinator

Ryan Fruchtenicht, Chief
CalFresh Policy Bureau

Carlos Ocampo, Chief
Field Operations Bureau

Taadhimeda Haynes
Staff Services Manager I

Sysvanh Kabkeo, Chief
CalFresh Management Operations Section

Paul Gardes
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Kevin Aslanian
Coalition of California Welfare Rights Organizations, Inc.

Antoinette Dozier
Western Center on Law and Poverty

**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
ALAMEDA COUNTY SOCIAL SERVICES AGENCY**

**Conducted on
September 15-19, 2014**

**California Department of Social Services
Human Rights and Community Services Division**

Civil Rights Bureau

744 P Street, M.S. 8-16-70

Sacramento, CA 95814

(916) 654-2107

Reviewer

Elsa Vazquez

TABLE OF CONTENTS

- I. INTRODUCTION**
- II. SUMMARY OF METHODOLOGY**
- III. DISSEMINATION OF INFORMATION**
- IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES**
- V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES**
- VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS**
- VII. STAFF DEVELOPMENT AND TRAINING**
- VIII. DISCRIMINATION COMPLAINT PROCEDURES**
- IX. COMMUNITY INPUT**
- X. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL**
- XI. CONCLUSION**

I. CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the Alameda County Social Services Agency (ACSSA) with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted on September 15-19, 2014. An exit interview was held to review the preliminary findings on September 19, 2014.

The review was conducted in the following locations:

Name of Facility	Address	Programs Reviewed	Non-English languages spoken by a substantial number of clients (5% or more)
Eastmont Office	6955 Foothill Blvd. Oakland, CA 94605	IHSS	Spanish, Chinese, Vietnamese, Farsi, Cambodian, and Tagalog.
North Oakland Self Sufficiency/State Hearings	2000 S. San Pablo Ave. Oakland, CA 94612	Cal-WORKS, Employment Services, and CalFresh	Spanish, Vietnamese, Farsi, Cambodian and Tagalog and Chinese.
South County Eden Area Multi-Service Center	24100 Amador Ave. Hayward, CA 94544	Cal-WORKS, Employment Services, and CalFresh	Spanish, Chinese, Vietnamese, Farsi, Cambodian and Tagalog.
Program & Integrity	7751 Edgewater Drive Oakland, CA 94621	Program Integrity Division	Spanish, Chinese, Vietnamese, Farsi, Cambodian and Tagalog
Oakland Main	401 Broadway Oakland, CA 94607	Call Center	Spanish, Chinese, Vietnamese, Farsi, Cambodian and Tagalog

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II. SUMMARY OF METHODOLOGY

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the 2014-2015 Civil Rights Compliance Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.
- Reviewed the previous Compliance Reviews and Corrective Action Plans submitted by the county.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of program managers
- Case file reviews
- Facility inspections
- Discussion with community advocates groups. In this review the following organization(s) were contacted for feedback. The following organizations responded to our request:

Amy Chen,
Steve Weiss,
Johanna H. Parnes,
Bay Area Legal Aid
1035 Market Street, 6th Floor
San Francisco, CA 94103

Marina Pantchenko, Attorney
Equal Justice Works Fellow
Sponsored by Hewlett Packard and Morgan, Lewis & Bockius LLP
Bay Area Legal Aid
1735 Telegraph Ave,
Oakland, CA 94612

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Accessibility for Clients with Visual or Hearing Impairments
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

Here is a summary of the sources of information used for the review:

Interviews Conducted of Public Contact Staff

Classifications	Total	Bilingual
Eligibility Workers	7	4
Adult Program Workers	4	2
Receptionist/Screeners	4	1
Employment Worker	2	0
Total	17	3

Program Manager Surveys

Number of surveys distributed	4
Number of surveys received	4

Reviewed Case Files

English speakers' case files reviewed	7
Non-English or limited-English speakers' case files reviewed	98
Languages of clients' cases	Amharic, ASL, Burmese, Chinese, Cantonese, Cambodian, Dari, Farsi, Lao, Mandarin, Nepali, Russian, Spanish, Tamil, Tigrinya, Tagalog, and Vietnamese.

Sections III through VIII of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section IX summarizes findings from discussions with community organizations, including advocate groups.

Section X reviews the county's compliance plan, and provides either approval of the plan as submitted, or lays out additional information to be submitted to gain approval.

Section XI of the report is reserved for a declaration of overall compliance.

III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

A. Findings

Access to Services, Information and Outreach	Yes	No	Some-times	Comments
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?		X		Office hours are Monday – Friday 8:30 a.m. - 5:00 p.m. Clients can mail in applications or complete online application via Benefits CalWIN.
Does the county have extended hours to accommodate clients?		X		Office hours are Monday – Friday 8:30 a.m. - 5:00. *In WTW activities, workers can accommodate clients during the lunch hour.
Can applicants access services when they cannot go to the office?	X			Clients can access online services at Benefits CalWIN or can request an application via telephone.
Does the county ensure the awareness of available services for individuals in remote areas?	X			The county ensures awareness by outreach efforts through different community meetings, forums and other community events.

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet “Your Rights Under	X			The Pub 13 is included in all intake and

Signage, posters, pamphlets	Yes	No	Some-times	Comments
California Welfare Programs” (Pub 13 – 6/11)?				renewal application packets.
Is the pamphlet distributed and explained to each client at intake and re-certification?	X			The Pub 13 is included in all intake and renewal packets and explained at these interviews.
Is the current version of Pub 13 available in Arabic, Armenian Cambodian, Chinese, English, Farsi Hmong, Japanese, Korean, Lao Mien, Portuguese, Punjabi, Russian Spanish, Tagalog, Ukrainian, Vietnamese?		X		The current version of Pub 13 was not available at the North Oakland Self Sufficiency Office. (Repeat Finding from 2011).
If the PUB 13 is not displayed in all the languages available, is there a poster that indicates that the Pub 13 is available in all 18 languages?		X		All office sites visited for this review did not have the Pub 13 display Or a poster indicating that the Pub 13 is available in all 18 languages.
Was the Pub 13 available in large print (English and Spanish), audiocassette and Braille?		X		The Pub 13 was not available in large print, audio or Braille at North Oakland Self Sufficiency Office. *(Repeat finding from 2011). The Pub 13 was not available in large print at South County Eden Office.
Were the current versions of the required posters present in the lobbies?	X *See Note			*Note -The Pub 86 was present in all the office sites visited, however the Name, Address and Phone Number of the CRC was not visible in the designated space. The label with the CRC information was posted over an area with important information

Signage, posters, pamphlets	Yes	No	Some-times	Comments
				regarding filing a complaint with PIAR. * See below, Section C. Observation (2) Pub 86 pictures.
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?		X		Six employees did not know the location of the required poster.
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?		X		At North Oakland Self Sufficiency Office, there were various instructional signage's which were not translated into the threshold languages. At South County Eden Multi-Service the directional and instructional signage were also not translated in threshold language.

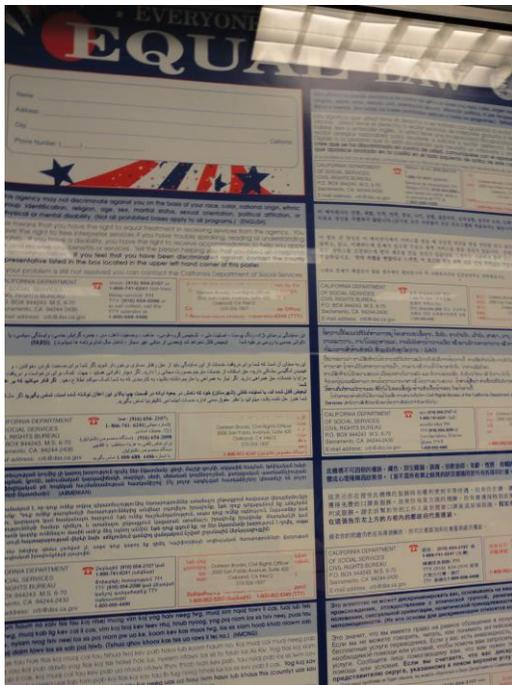
B. Corrective Actions

Informational Element	Corrective Action Required
Translated Pub 13	ACSSA shall ensure that the current version of the Pub 13 is available in all languages translated by CDSS and that the available translated versions are given to the clients in their primary language. Div. 21-115.2
Auxiliary aids	ACSSA shall ensure the availability of large print, Braille, and auditory aids for participants in all of the programs for which CDSS has oversight responsibility. Div. 21-115.4
Posters	ACSSA shall ensure that the most current version of posters on nondiscrimination provided by CDSS and USDA are prominently displayed in all waiting areas and reception rooms. Div. 21-107.211

Informational Element	Corrective Action Required
Directional signage	ACSSA shall ensure that instructional and directional signs are posted in waiting areas and other places that are frequented by clients and that where such areas are frequented by a substantial number of non-English-speaking clients, such signage shall be translated into appropriate languages. Div. 21-107.212 and .24

C. Observation

1. The reviewer observed there was additional signage posted by the security desk which was not translated into the threshold languages. Security staff should be informed and/or reminded of the **Div. 21-107.212 and .24**. Directional signage translation requirement.
2. See pictures below of the Pub 86 display in lobbies.



The county is required to use the latest version of each of the referenced documents. For your information, the most recent version for each of the above referenced documents is:

Pub 13	“Your Rights under California Welfare Programs”	06/11
Pub 86	“Everyone is Different, but Equal Under the Law”	03/07
Form AD 475B	“And Justice for All”	12/99

Contact the Civil Rights Bureau to receive the most recent versions, or download the Pub 13 from the CRB website

<http://www.cdss.ca.gov/civilrights/entres/forms/English/pub13.pdf>.

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

A. Findings and Corrective Actions

1. Facility Location: South County Eden Multi Service, 24100 Amador St, Hayward

Facility Element	Findings	Corrective Action
Parking	There is no "Unauthorized" signage at entrance to off-street accessible parking. * (Repeat finding from 2013)	An additional sign shall be posted either in a conspicuous place at each entrance to an off-street parking facility OR immediately adjacent to on-site accessible parking and visible from each parking space. (CA

	<p>There were 13 accessible parking spaces, and only 1 van parking space. The requirement would be there should be 2 van accessible parking spaces.</p> <p>There is no additional signage or additional language below the symbol of accessibility stating "Minimum Fine \$250" *(Repeat finding from 2013)</p> <p>Signage on pavement</p>	<p>T24 11B-502.8) pg 170</p> <p>The additional sign shall not be less than 17" wide x 22" high. Fig. 4 (CA T24 11B-502.8.1) pg 170</p> <p>The additional sign shall clearly state in letters with a min. height of 1" the following: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or special license plates issued for persons with disabilities will be towed away at the owner's expense. Towed vehicles may be reclaimed at: _____ or by telephoning _____." (CA T24 11B-502.8.2) pg 170</p> <p>Blank spaces shall be filled in with appropriate information as a permanent part of the sign. (CA T24 11B-502.8.2) pg 170</p> <p>For every 6 or fraction of 6 parking spaces at least 1 shall be a van parking space. (CA T24 11B-208.2.4) (ADA 208.2.4) pg. 176</p> <p>Additional language or an additional sign below the International Symbol of Accessibility shall state "Minimum Fine \$250". (CA T24 11B-502.6.2) pg 169</p> <p>The parking space shall be</p>
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	<p>does not clearly depict wheelchair occupant because of fading, needs to be repainted.</p> <p>The words “No Parking” painted on pavement in access aisles are faded and needs to be repainted. (*Repeat finding from 2013)</p> <p>Ramp slope in between accessible spaces should not be steeper than 8.3%. The ramp was too steep measuring between 9.3% - 10.8%.</p>	<p>marked with an International Symbol of Accessibility...in white on a blue background - a minimum 36” wide x 36” high. (CA T24 11B-502.6.4.1) pg 169</p> <p>The words “NO PARKING” shall be painted on the surface each access aisle. (CA T24 11B-502.3.3) pg 176</p> <p>This notice shall be painted in white letters a min. of 12” in height and located to be visible from the adjacent vehicular way. (CA 11B-502.3.3) pg 176</p> <p>Ramp runs shall have a running slope no steeper than 1:12. (CA T24 11B-405.2) (ADA 405.2) pg 183</p> <p>Cross slope of ramp runs shall not be steeper than 1:48. (CA T24 11B-405.3) (ADA 405.3) pg 183</p>
1st floor Men’s Restroom	Door pressure is excessive at 13 lbs.	<p>The force for pushing or pulling open a door or gate other than fire doors shall be as follows:</p> <ol style="list-style-type: none"> 1. Interior hinged doors and gates: 5 lbs. max. 2. Sliding or folding doors: 5 lbs. max. 3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbs. Exterior hinged doors: 5 lbs. max. (CA T24 11B-404.2.9 (1 - 4)) (ADA 404.2.9 (1 & 2)) pg 224
1 st floor Women’s Restroom	Door pressure is excessive at 12 lbs.	The force for pushing or pulling open a door or gate other than

		<p>fire doors shall be as follows:</p> <ol style="list-style-type: none"> 1. Interior hinged doors and gates: 5 lbs. max. 2. Sliding or folding doors: 5 lbs. max. 3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbs. Exterior hinged doors: 5 lbs. max. (CA T24 11B-404.2.9 (1 - 4)) (ADA 404.2.9 (1 & 2)) pg 224
3 rd floor Men's Restroom	Door pressure is excessive at 14 lbs.	<p>The force for pushing or pulling open a door or gate other than fire doors shall be as follows:</p> <ol style="list-style-type: none"> 1. Interior hinged doors and gates: 5 lbs. max. 2. Sliding or folding doors: 5 lbs. max. 3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbs. Exterior hinged doors: 5 lbs. max. (CA T24 11B-404.2.9 (1 - 4)) (ADA 404.2.9 (1 & 2)) pg 224
3 rd floor Women's Restroom	Door pressure is excessive at 18 lbs.	<p>The force for pushing or pulling open a door or gate other than fire doors shall be as follows:</p> <ol style="list-style-type: none"> 1. Interior hinged doors and gates: 5 lbs. max. 2. Sliding or folding doors: 5 lbs. max. 3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbs. Exterior hinged doors: 5 lbs. max. (CA T24 11B-404.2.9 (1 - 4)) (ADA 404.2.9 (1 & 2)) pg 224

	Towel Dispenser is too high at 46".	<p>Where towel or sanitary napkin dispensers, waste receptacles, or other accessories are provided in toilet facilities, at least one of each type shall be located on an accessible route. (CA T24 11B-603.5) pg 319</p> <p><u>All operable parts</u>, including coin slots, shall be 40" max. above the finish floor. (CA T24 11B-603.5) pg 319</p>
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A. Observation

There are several repeat findings which do not meet compliance with ADA requirements at this location from 2013 which need to be addressed.

2. Facility Location: North Oakland Self Sufficiency 2000 San Pablo Ave, Oakland

Facility Element	Findings	Corrective Action
Parking	<p>There is no "Unauthorized" signage at entrance to off-street accessible parking. *(Repeat finding from 2011)</p>	<p>An additional sign shall be posted either in a conspicuous place at each entrance to an off-street parking facility OR immediately adjacent to on-site accessible parking and visible from each parking space. (CA T24 11B-502.8) pg 170</p> <p>The additional sign shall not be less than 17" wide x 22" high. Fig. 4 (CA T24 11B-502.8.1) pg 170</p> <p>The additional sign shall clearly state in letters with a min. height of 1" the following: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or special license plates issued for</p>

	<p>Accessible parking spaces in the parking garage do not meet the minimum accessible space requirements:</p> <p>9' wide, 18' long, 5' access aisle</p> <p>Accessible spaces were "too short" in length by 2" to 4", measuring between 14'L & 16'L.</p> <p>Access aisle was too short in length between</p>	<p>persons with disabilities will be towed away at the owner's expense. Towed vehicles may be reclaimed at: _____ or by telephoning _____." (CA T24 11B-502.8.2) pg 170</p> <p>Blank spaces shall be filled in with appropriate information as a permanent part of the sign. (CA T24 11B-502.8.2) pg 170</p> <p>Car ... parking spaces shall be 18' long min. (CA T24 11B-502.2) (ADA 502.2) pg 173</p> <p>Car parking spaces shall be 9' wide min. and van parking spaces 12' wide min. shall be marked to define the width and shall have an adjacent access aisle complying with the "Access Aisle" heading in this section. (CA T24 11B-502.2) (ADA 502.2.) pg 173</p> <p>Access aisles shall adjoin an accessible route. (CA T24 11B-502.3) (ADA 502.3) pg 173</p> <p>Two parking spaces shall be permitted to share a common access aisle. (CA T24 11B-502.3) (ADA 502.3) pg 173</p> <p>Access aisles serving car ... parking spaces shall be 5' wide min. (CA T24 11B-502.3.1) (ADA 502.3.1) pg 173</p> <p>Access aisles shall extend the full required length of the</p>
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	<p>2" & 4", measuring between 14'L & 16'L.</p> <p>One of the van-accessible spaces had the access aisle (loading/unloading clearance) on the driver's side of the vehicle. *(Repeat finding from 2011)</p>	<p>parking spaces they serve. (CA T24 11B-502.3.2) (ADA 502.3.2) pg 173</p> <p>Access aisle for van parking spaces shall be located on the passenger side of the parking spaces. (CA T24 11B-502.3.4) pg 176</p>
Client Interview room	<p>The client interview room did not allow for turnaround in room (5' turnaround, 36" wide pathway, and floor.</p>	<p>Where the accessible route makes a 180° turn around an element which is less than 48" wide, clear width shall be 42" min. approaching the turn, 48" min. at the turn and 42" min. leaving the turn. (CA T24 11B-403.5.2) (ADA 403.5.2) pg 207</p> <p>The turning space shall be a space of 60" diameter min. (CA T24 11B-304.3.1) (ADA 304.3.1) pg 208</p> <p>The turning space shall be a T-shaped space within a 60" x 60" min. square with arms and base 36" wide min. (CA T24 11B-304.3.2) pg 208</p>
1 st floor Men's Restroom	<p>Door pressure is excessive at 10 lbs.</p>	<p>The force for pushing or pulling open a door or gate other than fire doors shall be as follows:</p> <ol style="list-style-type: none"> 1. Interior hinged doors and gates: 5 lbs. max. 2. Sliding or folding doors: 5 lbs. max. 3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbs. Exterior hinged doors: 5 lbs. max. (CA T24

		11B-404.2.9 (1 - 4)) (ADA 404.2.9 (1 & 2)) pg 224
1 st floor Women's Restroom	Door pressure is excessive at 15 lbs.	The force for pushing or pulling open a door or gate other than fire doors shall be as follows: 1. Interior hinged doors and gates: 5 lbs. max. 2. Sliding or folding doors: 5 lbs. max. 3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbs. Exterior hinged doors: 5 lbs. max. (CA T24 11B-404.2.9 (1 - 4)) (ADA 404.2.9 (1 & 2)) pg 224
2 nd floor Men's Restroom	Door pressure is excessive at 13 lbs.	The force for pushing or pulling open a door or gate other than fire doors shall be as follows: 1. Interior hinged doors and gates: 5 lbs. max. 2. Sliding or folding doors: 5 lbs. max. 3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbs. Exterior hinged doors: 5 lbs. max. (CA T24 11B-404.2.9 (1 - 4)) (ADA 404.2.9 (1 & 2)) pg 224
2 nd floor Women's Restroom	Door pressure is excessive at 14 lbs.	The force for pushing or pulling open a door or gate other than fire doors shall be as follows: 1. Interior hinged doors and gates: 5 lbs. max. 2. Sliding or folding doors: 5 lbs. max. 3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbs. Exterior hinged doors: 5 lbs. max. (CA T24

	Pipes under sink need to be rewrapped.	<p>11B-404.2.9 (1 - 4)) (ADA 404.2.9 (1 & 2)) pg 224</p> <p>Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact.</p> <p>(CA T24 11B-606.5) (ADA 606.5) pg 330</p> <p>There shall be no sharp or abrasive surfaces under lavatories and sinks. (CA T24 11B-606.5) (ADA 606.5) pg 330</p>
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A. Recommendation

There was no identifying signage located at the entry into the parking garage at North Oakland Self Sufficiency, 2000 San Pablo Ave, Oakland. It is recommended that a sign to identify the parking available for clients be posted. Security personnel in the parking garage stated that they only place a sign out when the lot is full and this signage does identify it is for ACSSA.

It was brought to the reviewer’s attention regarding client’s interview rooms, that there is a client interview room (#1007), which is larger and would meet the required accessible space requirements. It is this reviewer’s recommendation that this space be designated as the accessible client interview room, and that proper (ISA) signage is placed to identify it and staff be given responsibility to maintain it as an accessible room.

3. Facility Location: Eastmont Office, 6955 Foothill Blvd, Oakland

Facility Element	Findings	Corrective Action
Parking	<p>This is a shared facility with multiple businesses and the Health Department. The parking spaces measured located nearest the front entrance did not meet the minimum accessible space requirements:</p> <p>9’ wide, 18’ long, 5’ access aisle</p>	<p>Car ... parking spaces shall be 18’ long min.</p> <p>(CA T24 11B-502.2) (ADA 502.2) pg 173</p> <p>Car parking spaces shall be 9’ wide min. and van parking spaces 12’ wide min. shall be marked to define the width and shall have an adjacent access aisle complying with the “Access Aisle” heading in this section. (CA T24 11B-502.2)</p>

		<p>(ADA 502.2.) pg 173</p> <p>Access aisles shall adjoin an accessible route. (CA T24 11B-502.3) (ADA 502.3) pg 173</p> <p>Two parking spaces shall be permitted to share a common access aisle. (CA T24 11B-502.3) (ADA 502.3) pg 173</p> <p>Access aisles serving car ... parking spaces shall be 5' wide min. (CA T24 11B-502.3.1) (ADA 502.3.1) pg 173</p> <p>Access aisles shall extend the full required length of the parking spaces they serve. (CA T24 11B-502.3.2) (ADA 502.3.2) pg 173</p>
Exterior entrance	There was no International Symbol of Accessibility (ISA) signage at main entrance of building. (*Repeat Finding from 2013)	<p>In existing buildings and facilities where not all entrances comply with Section 33, Doors, Doorways and Gates, entrances complying with Section 33, Doors, Doorways and Gates shall be identified by the International Symbol of Accessibility complying with "International Symbol of Accessibility" heading in Section 57, Signs & Identification. (CA T24 11B-216.6) (ADA 216.6) pg 28</p> <p>Pictograms and their field shall have a non-glare finish. (CA T24 11B-703.6.2) (ADA 703.6.2) pg 376</p> <p>Pictograms shall contrast with their field with either a light</p>

		pictogram on a dark field or a dark pictogram on a light field. (CA T24 11B-703.6.2) (ADA 703.6.2) pg 376
Men's Restroom	<p>Door pressure is excessive at 15 lbs.</p> <p>Pipes under sink need to be rewrapped. (*Repeat Finding from 2013)</p> <p>Soap dispenser is too high at 48". (*Repeat Finding from 2013)</p> <p>Towel dispenser is too high at 48".</p>	<p>The force for pushing or pulling open a door or gate other than fire doors shall be as follows:</p> <ol style="list-style-type: none"> 1. Interior hinged doors and gates: 5 lbs. max. 2. Sliding or folding doors: 5 lbs. max. 3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbs. Exterior hinged doors: 5 lbs. max. (CA T24 11B-404.2.9 (1 - 4)) (ADA 404.2.9 (1 & 2)) pg 224 <p>Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. (CA T24 11B-606.5) (ADA 606.5) pg 330</p> <p>There shall be no sharp or abrasive surfaces under lavatories and sinks. (CA T24 11B-606.5) (ADA 606.5) pg 330</p> <p>Where towel or sanitary napkin dispensers, waste receptacles, or other accessories are provided in toilet facilities, at least one of each type shall be located on an accessible route. (CA T24 11B-603.5) pg 319</p> <p><u>All operable parts</u>, including coin slots, shall be 40" max. above the finish floor. (CA T24 11B-603.5) pg 319</p>

	<p>Accessible parking spaces do not meet the minimum accessible space requirements:</p> <p>9' wide, 18' long, 5' access aisle</p> <p>The parking spaces were too short between ½" to 2" in length.</p> <p>The words "No Parking" painted on pavement in access aisles are faded and need to be repainted.</p>	<p>Car ... parking spaces shall be 18' long min. (CA T24 11B-502.2) (ADA 502.2) pg 173</p> <p>Car parking spaces shall be 9' wide min. and van parking spaces 12' wide min. shall be marked to define the width and shall have an adjacent access aisle complying with the "Access Aisle" heading in this section. (CA T24 11B-502.2) (ADA 502.2.) pg 173</p> <p>The words "NO PARKING" shall be painted on the surface each access aisle. (CA T24 11B-502.3.3) pg 176</p> <p>This notice shall be painted in white letters a min. of 12" in height and located to be visible from the adjacent vehicular way. (CA 11B-502.3.3) pg 176</p>
Main entrance	<p>There was no International Symbol of Accessibility (ISA) signage at main entrance of building.</p>	<p>In existing buildings and facilities where not all entrances comply with Section 33, Doors, Doorways and Gates, entrances complying with Section 33, Doors, Doorways and Gates shall be identified by the International Symbol of Accessibility complying with "International Symbol of Accessibility" heading in Section 57, Signs & Identification. (CA T24 11B-216.6) (ADA 216.6) pg 28</p> <p>Pictograms and their field shall have a non-glare finish. (CA T24 11B-703.6.2) (ADA</p>

		<p>703.6.2) pg 376</p> <p>Pictograms shall contrast with their field with either a light pictogram on a dark field or a dark pictogram on a light field. (CA T24 11B-703.6.2) (ADA 703.6.2) pg 376</p>
Water fountain	Drinking fountain does not comply with the following: Location, Clear ground floor space, and alcove depth.	All drinking fountains shall be located completely within alcoves, positioned completely between wing walls, or otherwise positioned so as not to encroach into pedestrian ways. (CA T24 11B-602.9) pg 304
Men's Restroom	Door pressure is excessive at 15 lbs.	The force for pushing or pulling open a door or gate other than fire doors shall be as follows: <ol style="list-style-type: none"> 1. Interior hinged doors and gates: 5 lbs. max. 2. Sliding or folding doors: 5 lbs. max. 3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbs. Exterior hinged doors: 5 lbs. max. (CA T24 11B-404.2.9 (1 - 4)) (ADA 404.2.9 (1 & 2)) pg 224
Women's Restroom	Door pressure is excessive at 14 lbs.	The force for pushing or pulling open a door or gate other than fire doors shall be as follows: <ol style="list-style-type: none"> 1. Interior hinged doors and gates: 5 lbs. max. 2. Sliding or folding doors: 5 lbs. max. 3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbs. Exterior hinged doors: 5 lbs. max. (CA T24 11B-404.2.9 (1 - 4)) (ADA

	Pipes under sink need to be rewrapped.	<p>404.2.9 (1 & 2)) pg 224</p> <p>Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact.</p> <p>(CA T24 11B-606.5) (ADA 606.5) pg 330</p> <p>There shall be no sharp or abrasive surfaces under lavatories and sinks. (CA T24 11B-606.5) (ADA 606.5) pg 330</p>
Unisex Restroom	Door pressure is excessive at 18 lbs.	<p>The force for pushing or pulling open a door or gate other than fire doors shall be as follows:</p> <ol style="list-style-type: none"> 1. Interior hinged doors and gates: 5 lbs. max. 2. Sliding or folding doors: 5 lbs. max. 3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbs. Exterior hinged doors: 5 lbs. max. <p>(CA T24 11B-404.2.9 (1 - 4)) (ADA 404.2.9 (1 & 2)) pg 224</p>

A. Recommendation

It was brought to the reviewer’s attention that the Edgewater Office is not a designated public office. This is a secure building and front entrance doors remain locked at all times. This office is located near the Oakland Airport and is not easily accessible to clients. Clients (Visitors) and/or representatives only come to this office to view their case files, per their request. Staff from Edgewater stated clients could request to view their files at any of the other offices closest to them.

The receptionist greets visitors through an intercom and grants access to them accordingly. The receptionist can assist and open the door for a visitor in a wheelchair if needed. However, this building and parking lot are not in compliance with ADA requirements.

It is the reviewer’s recommendation, Edgewater Office, not be utilized for the public. Clients/visitors should be referred to one of the available public contact offices closest to them to review their case files. ACCSA should consider developing a process or procedure and train staff on how to refer a client wanting to review their case file and direct to their nearest office. **Div. 21-109.2.24**

V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDD’s), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals’ primary languages if the forms and materials are provided by CDSS in that language, and that information inserted in notices of action (NOA) be in the individuals’ primary language.

A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews

Question	Yes	No	Some-times	Comments
Does the county identify a client’s language need upon first contact? How?	X			Clients are asked to identify their preferred language at initial contact.
Does the county use a primary language form?		X		ACSSA has a Language Preference Form 5805. The reviewer did not find the form

Question	Yes	No	Some-times	Comments
				used consistently in the program's case files reviewed.
Does the client self-declare on this form?	X			Client's self- declare on the application form and/or verbally.
Are non-English- or limited- English-speaking clients provided bilingual services?			X	Bilingual Services are provided through the use of Bilingual workers and LionBRIDGE Language Line. Bilingual staffing is inadequate to service the large client population speaking other languages.
After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter?	X			The current process is for a worker to contact a bilingual worker through their Supervisor, and/or by utilizing ACSSA Bilingual Roster. In the case if no bilingual worker is available the worker can contact LionBRIDGE. ** ACSSA has been in process of finalizing a LEP Plan since 2011. According to the Language Access Coordinator this plan had not been finalized.
Is there a delay in providing services?	X			Staff interviewed indicated there could be a delay due to a unique language.
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			ACSSA contracts with LionBRIDGE Language Line for interpreters, and also has a Bilingual roster
Are county interpreters determined to be competent?		X		Bilingual workers who provide interpretive services are to be certified. There were cases reviewed in which a Spanish speaking worker was used and was not a certified bilingual worker.

Question	Yes	No	Some-times	Comments
Does the county have adequate interpreter services?		X		Staff interviewed stated it is very helpful to have bilingual workers available; however staff stated there is a need for more bilinguals. Program Managers also stated there is a need for more bilingual workers specifically in the Call Center. Program Manager's indicated due to budgets they are currently understaffed of bilingual workers.
Does the county allow minors to be interpreters? If so, under what circumstances?	X			Per case files reviewed there was one instance a 16 year old nephew was used to provide interpreter services. Also, in cases reviewed there was mention that a client's son and/or daughter provided interpretive services, however it was not stated if it was an adult or minor?
Does the county allow the client to provide his or her own interpreter?	X			Per case files reviewed there were 8 cases were clients used a family member to provide interpretive services however there was no documentation if a consent release was signed.
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			Per staff interviewed they stated the client would be asked if he/she understood what was interpreted. There is no form or documentation.
Does the county use the CDSS-translated forms in the clients' primary languages?	X			In the case file review, there were some languages that are not available in CDSS-translated forms such as Amharic, Tigrinya, etc.
Is the information that is to be inserted into NOA translated into the client's primary language?	X			Per staff interviewed they indicated they would insert a translation in client's language if needed.
Does the county provide				The auxiliary aides in large

Question	Yes	No	Some-times	Comments
auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?		X		print, or Braille were not available at San Pablo Office, and Hayward Office.
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			Staff interviewed stated they would assist a client who may have a learning disability or cannot read or write.
Does the county offer screening for learning disabilities?	X			In the Welfare to Work program clients are offered screening for disabilities.
Is there an established process for offering screening?	X			Staff interviewed stated that clients would be asked about screening during the initial WTW assessment.
Is the client identified as having a learning disability referred for evaluation?	X			Staff interviewed stated clients would be provided a referred for evaluation.

B. Corrective Actions

Area of Findings	Corrective Actions
Bilingual Staff	<p>ACSSA shall ensure that a sufficient number of qualified employees shall be assigned to public contact positions in each program and/or location serving a substantial number of non-English-speaking persons.</p> <p>The number of public contact positions in each major occupational group shall be determined for each program/location whose non-English language cases equal or exceed five percent of the total cases for each program/location.</p> <p>Div 21- 115.1</p>
Timely Services	ACSSA must ensure that bilingual/interpretive services are

Area of Findings	Corrective Actions
	prompt and without undue delay. Div. 21-115
Use of Minors	ACSSA shall only allow the use of a minor (under the age of 18 years) to temporarily act as an interpreter under extenuating circumstances or at the specific request of the applicant/recipient. Div. 21-115.16
Auxiliary Aids	ACSSA shall ensure the availability of auxiliary aids and services to persons who are deaf or hearing impaired, or persons with impaired speech, vision or manual skills where necessary to afford such persons an equal opportunity to access program services. Div 21-115.41

C. Observation

It is this reviewer’s observation that ACSSA has a need for hiring more bilingual workers. The county is not meeting the bilingual staffing needs in some programs according to the primary language data statistic tables provided in the Compliance Plan.

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant’s/recipient’s ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant’s/recipient’s request for auxiliary aids and services.

A. Findings from Case File Reviews and Staff Interviews

Documented Item	Adult Programs (IHSS & APS)	CalWORKs & Employment Services	CalFresh	Fraud
Ethnic origin documentation	On Application, and Interview Face sheet	Form 50-85, SAWS 1 & CalWin	Form 50-85, SAWS 1 & CalWin	CalWin, FRED Form Referral sheet
Primary language documentation	CMIPS, Interview Face sheet	Form 50-85, SAWS1 and CalWin,	Form 50-85, SAWS1 and CalWin	CalWin, FRED Form Referral sheet
Method of providing bilingual services and	CMIPS case comments, Interview Face Sheet	Not consistently documented in case comments.	Not consistently documented in case	Not consistently documented in case

Documented Item	Adult Programs (IHSS & APS)	CalWORKs & Employment Services	CalFresh	Fraud
documentation			comments.	comments.
Client provided own interpreter	CMIPS and Interview Face Sheet	CalWin; In cases reviewed a few indicated a family member was used as interpreter.	CalWin; In cases reviewed a few indicated a family member was used as interpreter.	CalWIN; In cases reviewed a few indicated a family member was used as interpreter.
Method to inform client of potential problem using own interpreter	None found, no documentation of method to inform client of potential problem using their own interpreter.	None found, no documentation of method to inform client of potential problem using their own interpreter.	None found, no documentation of method to inform client of potential problem using their own interpreter.	None found, no documentation of method to inform client of potential problem using their own interpreter.
Release of information to Interpreter	No form found- Not documented	No form found - Not documented	No form found- Not documented	No form found- Not documented
Individual's acceptance or refusal of written material offered in primary language	Not consistently documented in cases reviewed.	Form 5805, form not consistently found in cases reviewed.	Form 5805, form not consistently found in cases reviewed.	Not noted
Documentation of minor used as interpreter	Family members were used as interpreters in several cases, but it did not mention if it was adult children or not?	Family members were used as interpreters in several cases, but it did not mention if it was adult children or not?	Family members were used as interpreters in several cases, but it did not mention if it was adult children or not?	Noted in case notes a minor was used as interpreter.
Documentation of circumstances for using minor interpreter temporarily	None found	None found	None found	Not documented circumstance for using minor.

Documented Item	Adult Programs (IHSS & APS)	CalWORKs & Employment Services	CalFresh	Fraud
Translated notice of actions (NOA) contain translated inserts	No NOA with translation inserts provided for this case review	No NOA with translation inserts provided for this case review	No NOA with translation inserts provided for this case review	No NOA with translation inserts provided for this case review
Method of identifying client's disability	CMIPS case comments	Statement of Facts	Statement of Facts	None found
Method of documenting a client's request for auxiliary aids and services	None found	CalWIN case comments	None found	None found

B. Corrective Actions

Areas of Action	Corrective Action
Documentation if client provided own interpreter	When applicants/recipients provide their own interpreter, the CWD shall ensure that the applicants/recipients are informed of the potential problems for ineffective communication. The CWD shall document in the case record that the applicants/recipients were so informed. Div. 21-116.23
Temporary use of a minor (under 18 years of age) as an interpreter	When a minor (under 18 years of age) is used as an interpreter, the CWD shall so document the circumstances requiring <u>temporary use</u> of minors in the case record. Div. 21-116.22 Only under extenuating circumstances or at the specific request of the applicant/recipient shall a CWD allow a minor (under the age of 18 years) to temporarily act as an interpreter.
Documentation of interpreter signed confidentiality statement	Consent for the release of information shall be obtained from applicants/recipients when individuals other than CWD employees are used as interpreters and the case record shall be so documented. Div. 21-116.24

Areas of Action	Corrective Action
Documentation that bilingual services were provided	Document the method used to provide bilingual services, e.g., assigned worker is bilingual, other bilingual employee acted as interpreter, or telephone interpreter service used, or, volunteer interpreter was used, or client provided interpreter. Div. 21-116.22
General	ACSSA must ensure that proper documentation is kept in the file that identifies all the required elements to ensure compliance. Div. 21-116

C. Additional Finding

There are repeat findings from the 2011 & 2013 Compliance Review in the area of documentation of interpretive services, bilingual staffing and effectiveness of communication. In reviewing the case samples, the Language Preference Form 50-85 is not utilized consistently across all programs. Staff does not document how interpretive services are provided at initial and subsequent contacts.

Bilingual staff is not documenting that they are bilingual certified. The reviewer also did not find the following; Method to inform client of potential problem using their own interpreter, and/or a signed Release of Confidential information to Interpreter in the case samples. **Div 21-116.23 and .24**

VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights and cultural awareness training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

A. Findings

Interview questions	Yes	No	Some-times	Comments
Do employees receive continued Division 21 Training?			X	Per staff interviewed two staff stated they couldn't remember when they last had Division 21 training.
Do employees understand the county policy regarding a client's rights and procedure				Staff interviewed provided various responses; they would either refer to their Supervisor,

to file a discrimination complaint?		X		and/or would refer to Human Resources and some stated they would refer it to the Civil Rights Coordinator.
Does the county provide employees Cultural Awareness Training?	X			
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	X			Staff interviewed stated they were aware of the cultural groups in their area.

B. Corrective Actions

Training Area	Corrective Action
Division 21, Civil Rights Training	ACSSA shall ensure that employees receive Division 21 civil rights training at the time of orientation, as well as ongoing training to ensure that public contact staff has knowledge of Division 21, including familiarization with the discrimination complaint process. Div. 21-117.1

D. Observation

In reviewing the Training and Consulting Team (TACT) Civil Rights Training Module, the training is incomplete and inconsistent with Div 21-117.1.2 and .3. It is not clear on the steps of filing a client discrimination complaint, and the timeframes involved in handling a client discrimination complaint. The training module encompasses overall procedures for civil rights complaints, personnel complaints and EEO complaints for both clients and employees.

VIII. DISCRIMINATION COMPLAINT PROCEDURES

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator responsibility to maintain this log.

A. Findings from Staff Interviews and Program Manager Surveys

Interview and review areas	Yes	No	Some-times	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?		X		Per staff interviewed 4 staff could not identify the differences between a program complaint, discrimination complaint and personnel complaint.
Did the employees know who the Civil Rights Coordinator is?		X		Per staff interviewed 3 staff did not know who the Civil Rights Coordinator was.
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?		X		Per staff interviewed 6 staff did not know the location of the Civil Rights Poster.
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?		X		The complaint log did not reconcile with Civil Rights Bureau data. The complaint log is not complete and in compliance with Div 21-203.21

B. Corrective Action

Element	Corrective Action
Discrimination Process	ACSSA shall ensure staff have knowledge of the discrimination complaint process and are able to differentiate it from other complaint processes. Div. 21-117 and 21-203
Civil Rights Coordinator	ACSSA shall ensure that staff is knowledgeable regarding contact information of the civil rights coordinator, at minimum, where the information can be located. Div. 21-117 and 21-107.21

C. Additional Finding

Based on the findings of this review and those of prior years, it appears that the training provided may not include content related to actual worker casework practices needed to ensure compliance with the civil rights policies being presented. Specific examples of this are the findings related to case documentation and worker requirements when clients use their own interpreters.

It was also observed that staff could not clearly articulate differences between the process for resolving discrimination complaints and program benefit complaints (Fair Hearings vs. Discrimination Complaint Process).

The Training and Consulting Team (TACT) of the Social Services Agency is responsible for the development, coordination and presentation of training to all agency staff. It is unclear where the responsibility for coordination of Division 21 content (Civil Rights Program regulations) lies. Separate organizational units appear to have oversight functions for parts of the program – e.g., Civil Rights Coordinator, Language Access Policy Office, and ADA Coordinator.

There appears to be a decentralized accountability for managing client discrimination complaints that results in an ineffective complaint process and presents a compliance issue with Division 21 Section 21-203.21. This section mandates that a control log be maintained in which all client complaints of discrimination are entered by year and date the complaint was received. Additional requirements for this centralized log are listed in Division 21-203.211-.219

D. Observation

An additional observation by the reviewer, at 2000 San Pablo, Oakland, North County Self Sufficiency Office, there was a “Client Advocate Office” in their lobby. This was not mentioned in the 2014-2015 Civil Rights Compliance Plan. The Client Advocate states she handles client complaints. It is not clear, if this worker only handles program complaints or handles all complaints. The role of this Client Advocate should be provided to get a better understanding on the complaint process.

IX. COMMUNITY INPUT

As a part of this review, and as noted in Section II, feedback was sought from community and advocate groups. The following summarizes their observations, and will provide issues that the county management team can address to improve their operations from a civil rights perspective.

A. Major observations include:

- 1. Interpretive Services;** for example: clients have been asked to bring a family member to provide interpretive services when it is a unique language. This was also mentioned in the 2011 Report.
- 2. Reasonable Accommodations;** clients with a disability have been denied their request for a reasonable accommodations. For example a client’s who had

health restriction requesting a home visit was denied because they were not in a wheelchair; another client unable to make it to her appointment due to recent baby delivery, was denied her request to reschedule appointment.

B. Corrective Actions

1. Staff should be offering the provision of interpretive services for all languages by utilizing the in-house Bilingual roster or LionBRIDGE Language Line, and not request clients to provide their own interpreter. The LEP Plan, which is in the final stages, will be a vital training tool when implemented and included in the TACT training modules. **Div 21-115.15**
2. Clients who request a reasonable accommodation should be accommodated based on their own circumstance, such as worker conducting a home visit for IHSS appointment. It should not be required the client be in a wheelchair in order to request an in home appointment for IHSS.

X. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

Thank you for submitting your agency's Civil Rights Compliance Plan. Before approval, however, we are requesting the following augmentations to your plan:

- a. **SECTION IV. DISSEMINATION OF INFORMATION**
- b. **SECTION V. SERVICES TO NON-ENGLISH-SPEAKING, LIMITED –ENGLISH-PROFICIENT APPLICANTS/RECIPIENTS AND APPLICANTS/RECIPIENTS WITH DISABILITIES**
- c. **SECTION XII. DISCRIMINATION COMPLAINT PROCEDURE**

Please submit these items with your corrective action plan for this review.

XI. CONCLUSION

The CDSS reviewer found the Alameda County Social Services Agency staff informative and friendly. Particular thanks to Darleen Brooks, Civil Rights Coordinator, for organizing the details of the review. In each District Office, staff were helpful with the facility reviews, case reviews, and computer assistance.

There are relevant findings in language services, case documentation, staff development, discrimination complaint process, reasonable accommodations, civil rights program oversight and plan development. It is apparent that the fragmented organizational responsibility for specific components of the Civil Rights Program without centralized oversight/accountability for the overall program has contributed to the findings in this review. The role of the Civil Rights Coordinator has other roles;

Personnel Officer, and Diversity Coordinator which overlap and may be affecting the efficiency of the program.

The CDSS found the Alameda County Social Services Agency County in partial compliance with CDSS Division 21 Regulations, and other applicable state and federal laws.

The Alameda County Social Services Agency must remedy the deficiencies identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule of all actions that will be taken to correct the deficiencies, and an indication of who will be responsible for implementing the corrective action.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance violations and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff is available to provide technical assistance as requested.